

# **Exhibit 215**

CONFIDENTIAL

Page 1

CONFIDENTIAL - WILLIAM AHDOUT  
UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re: :  
: Master File No.  
Global Brokerage, Inc. : 1:17-cv-00916-RA  
F/k/a FXCM, Inc. :  
Securities Litigation :  
----- :

REMOTE VIDEO DEPOSITION OF:  
WILLIAM AHDOUT  
TUESDAY, FEBRUARY 16, 2021

REPORTED BY:  
SILVIA P. WAGE, CCR, CRR, RPR  
JOB NO. 4398817

CONFIDENTIAL

Page 107

1 CONFIDENTIAL - WILLIAM AHDOUT

2 A. Okay.

3 MR. LaPOINTE: And, just for the  
4 record, this is document beginning GLBR 189079.

5 A. Okay.

6 Q. And does this appear to be an e-mail  
7 from John Dittami to David Sassoon copying  
8 yourself and Ken Grossman on April 14th, 2017 at  
9 7:49 a.m.?

10 A. It appears to be, yes.

11 Q. And I direct your attention to the  
12 very top line of the e-mail, "Just to confirm  
13 steps for meeting."

14 Do you see that?

15 A. Yes.

16 Q. So reviewing the language of this  
17 e-mail, do you recall having a meeting with  
18 Mr. Sassoon and/or Mr. Grossman and Mr. Dittami  
19 around the time of this e-mail?

20 A. I do not remember meetings from  
21 11 years ago.

22 Q. So would it be fair to say that the  
23 answer is, no, you don't, specifically, remember  
24 this one?

25 A. I don't, specifically, remember

CONFIDENTIAL

Page 200

1 CONFIDENTIAL - WILLIAM AHDOUT

2 Q. Were there ever any times when FXCM  
3 and Effex agreed to apply a different rate to all  
4 of Effex's trading for a period or some portion  
5 of it?

6 A. Well, again, it was a very fluid  
7 situation and it was negotiated many times.

8 So, if you have a specific question  
9 when it was negotiated, please refresh my memory  
10 and I'm happy to tell you.

11 Q. Do you recall any specific instances  
12 where that happened?

13 A. I know that it happened. I don't  
14 remember, specifically, from ten years ago when  
15 and how much and to what context they happened.

16 Q. Could you take a look at what has  
17 been labeled at Exhibit No. 30.

18 (Deposition Exhibit 30, 4/18/11  
19 e-mail from Paresh Patel to William Ahdout  
20 GLBR\_00064414 marked Confidential, was marked for  
21 identification.)

22 A. Okay.

23 MR. LaPOINTE: And, for the record,  
24 this is, I believe, a single page document with  
25 the Bate Stamp GLBR 64414.